

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF THE SUBURBAN TEAMSTERS)	
OF NORTHERN ILLINOIS PENSION FUND)	
)	
Plaintiff,)	
)	No. 2014 C 8638
v.)	
)	Judge Coleman
ED HENRY CONCRETE CONSTRUCTION &)	
MAINTENANCE, INC.)	
a dissolved Illinois corporation)	Magistrate Judge Schenkier
)	
Defendant.)	

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COME the Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on October 31, 2014 for collection of delinquent contributions plus attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Corporate service was made upon ED HENRY CONCRETE CONSTRUCTION & MAINTENANCE, INC., a dissolved Illinois corporation was made on the Defendant on November 5, 2014 and a copy of the proof of service was filed with the court on November 6, 2014.
3. Defendant is now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$1,901.00	Pension
\$925.00	Attorneys fees
<u>\$499.00</u>	Court costs
\$3,325.00	

WHEREFORE, Plaintiffs pray for:

1. Entry of judgment against Defendant, ED HENRY CONCRETE CONSTRUCTION & MAINTENANCE, INC. a dissolved Illinois corporation, and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS PENSION FUND in the amount of \$3,325.00.

TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS PENSION FUND

s/John J. Toomey
ARNOLD AND KADJAN
203 N. LaSalle Street, Suite 1650
Chicago, IL 60601
Telephone No.: (312) 236-0415
Facsimile No.: (312) 341-0438
Dated: December 1, 2014